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8 **UNITED STATES DISTRICT COURT**
9 **EASTERN DISTRICT OF CALIFORNIA**
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11 UNITED STATES OF AMERICA,
12 Plaintiff,

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14 v.
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16 ANTHONY RODRIGUEZ,
17 Defendant.
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Case No: 1:20-CR-00236-NONE-SKO

**STIPULATION BETWEEN THE UNITED
STATES AND GUARDIAN AD LITEM
REGARDING PRODUCTION OF PROTECTED
INFORMATION; PROTECTIVE ORDER RE:
SAME**

20 WHEREAS, the discovery in this case contains private personal information regarding third
21 parties and alleged victims, including but not limited to their names, dates of birth, physical descriptions,
22 telephone numbers and/or residential addresses ("Protected Information"); and

23 WHEREAS, it is desirable to avoid both the necessity of large scale redactions and the
24 unauthorized disclosure or dissemination of this information to anyone not authorized to receive
25 discovery in this matter; and

26 WHEREAS the government and defense counsel previously agreed that entry of a stipulated
27 protective order is appropriate in this case,
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1 THEREFORE, DAVID M. MEYERS, appointed guardian ad litem (Dkt. No. 20), and the United
2 States of America, by and through its counsel of record, hereby agree and stipulate as follows:

3 1. This Court may enter a protective order pursuant to Rule 16(d) of the Federal Rules of
4 Criminal Procedure, and its general supervisory authority.

5 2. This Order pertains to all discovery provided to or made available to DAVID M. MEYERS
6 in his role as guardian ad litem in this case (hereafter, collectively known as “the discovery”).

7 3. By signing this Stipulation and Protective Order, DAVID M. MEYERS agrees not to share
8 any documents or other information that contain Protected Information with anyone other than attorneys,
9 designated investigators, designated experts, designated social workers, and other support staff of
10 Dependency Legal Services as required to meet his obligations as guardian ad litem in this case.

11 4. The discovery and information therein may be used only in connection with DAVID M.
12 MEYERS’ advocate role as guardian ad litem in this case and for no other purpose. The discovery is now
13 and will forever remain the property of the United States of America (“Government”). DAVID M.
14 MEYERS will return the discovery to the Government or alternatively destroy the material at the
15 conclusion of his representation.

16 5. DAVID M. MEYERS will store the discovery in a secure place and will use reasonable
17 care to ensure that it is not disclosed to third persons in violation of this agreement.

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6. DAVID M. MEYERS shall be responsible for advising his employees and members of his team of the contents of this Stipulation and Order and make his best efforts to ensure compliance with the order.

IT IS SO STIPULATED.

Dated: February 4, 2021

By: /s/ David M. Meyers
David M. Meyers
Guardian ad Litem

Dated: February 4, 2021

McGREGOR W. SCOTT
United States Attorney

By: /s/ Laura D. Withers
Laura D. Withers
Assistant U.S. Attorney

IT IS SO ORDERED.

Dated: February 5, 2021

/s/ Sheila K. Oberto
UNITED STATES MAGISTRATE JUDGE